

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Carrie Teager Plaintiff, v. Financial Business and Consumer Solutions, Inc. aka FBCSI fka Federal Bond and Collection Service, Inc. c/o Illinois Corporation Service Corp. 801 Adlai Stevenson Drive Springfield, IL 62703, Defendant.	Case No. COMPLAINT FOR VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT Jury Demand Included
---	--

Now come Plaintiff, by and through their attorneys, and for her Complaint, alleges as follows:

JURISDICTION AND VENUE

- 1- Plaintiff bring this action for damages, and other legal and equitable remedies, resulting from the illegal actions of Defendants practices under the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. (ôFDCPAö).
- 2- This Court has jurisdiction under 28 U.S.C. §1331 (general federal question), §1337, 15 U.S.C. § 1692k(d) (FDCPA).
- 3- Venue in this District is proper because defendant transacts business here.

PARTIES

- 4- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the ôDebtö).
- 5- Plaintiff is a resident of the State of the Illinois.
- 6- Defendant is a business entity with its principal office in the State of Pennsylvania.

- 7- Defendant uses instruments of interstate commerce for its principal purpose of business, which it the collection of debts.
- 8- Defendant regularly attempts to collects, or attempts to collect, debts owed or due another.
- 9- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.
- 10- Defendant uses instruments of interstate commerce for its principal purpose of business, which it the collection of debts.

FACTS COMMON TO ALL COUNTS

- 11- Between August 2014 and September 2014, Defendant called Plaintiff several times to collect the Debt.
- 12- During several of these communications, Defendant failed to identify itself as a debt collector as required under the FDCPA.
- 13- Defendant damaged Plaintiff.
- 14- Defendant violated the FDCPA.

COUNT I

- 15- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 16- Defendant violated 15 USC § 1692e(11) by failing to identify itself as a debt collector.

COUNT II

- 17- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 18- Defendant violated 15 USC §1692e(10) by using false representation or deceptive means to collect a debt.

COUNT III

- 19- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

20- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, a debt.

JURY DEMAND

21- Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

22- Plaintiff prays for the following relief:

- a- Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b- Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c- Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d- Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

By: /s/ Richard J. Meier
Richard J. Meier, Esq.
53 W. Jackson Blvd, Suite 304
Chicago, IL 60604
Tel: 312-242-1849
Fax: 312-242-1841
richard@meierllc.com
Attorney for Plaintiff